



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 4, 2022

BY ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Sq.
New York, NY 10007

MEMO ENDORSED

Re: United States v. Cristobal, 20 Cr. 463 (KPF)

Dear Judge Failla:

The Government respectfully requests a two-week extension of its opposition deadline for the defense motions (from April 8 to April 22) and a corresponding extension for the defense reply (from April 22 to May 6). The defense consents.

The defense motions argue, among other things, that a case agent swore to inaccurate statements in the Complaint and the search warrants in this case. That case agent has since retired from the DEA, and the Government's efforts to contact the former agent to schedule an interview were unsuccessful until this afternoon. The Government is scheduled to interview the former agent later this week. Accordingly, and in light of the recent adjournment of trial, the Government respectfully requests a two-week extension of the remaining filing deadlines for defense motions.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

by: /s/ Jun Xiang
Jun Xiang / Kyle Wirshba
Assistant United States Attorneys
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CC
Kristen Santillo, Esq. (By ECF)

Application GRANTED.

The Clerk of Court is directed to terminate the motion at docket entry 60.

Dated: April 4, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE